

CLERK'S OFFICE U.S. DIST. COURT
AT ROANOKE, VA
FILED

NOV 18 2021

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
ROANOKE DIVISION

JULIA S. DUDLEY, CLERK
BY:  DEPUTY CLERK

UNITED STATES OF AMERICA) Case No. 7-21CR47
)
v.) SEALED INDICTMENT
)
SEDALE YOUNG) In violation of:
JERMAINE DRUMMOND) Title 18 U.S.C. § 2
) Title 18 U.S.C. §§ 922(a)(6), 924(a)(2)

COUNT ONE

The Grand Jury charges that:

1. On or about August 7, 2019, in the Western District of Virginia, the defendants, **SEDALE YOUNG** and **JERMAINE DRUMMOND**, in connection with the acquisition of a firearm, a Taurus, model G2C, .40 caliber pistol, from SWVA Arms, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to SWVA Arms, which statement was intended and likely to deceive SWVA Arms, as to a fact material to the lawfulness of such sale of the said firearm to the defendants under Chapter 44 of Title 18, United States Code, in that the defendants did execute a Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473, Firearms Transaction Record, to the effect that defendant **SEDALE YOUNG** was the actual buyer of the firearm, when in fact as the defendants then knew, defendant **JERMAINE DRUMMOND** was the actual buyer of the firearm, and did aid and abet in the same.

2. All in violation of Title 18, United States Code, Sections 2, 922(a)(6), and

924(a)(2).

COUNT TWO

The Grand Jury further charges that:

1. On or about August 15, 2019, in the Western District of Virginia, the defendants, **SEDALE YOUNG** and **JERMAINE DRUMMOND**, in connection with the acquisition of a firearm, a Taurus, model G2C, 9mm pistol, from SWVA Arms, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to SWVA Arms, which statement was intended and likely to deceive SWVA Arms, as to a fact material to the lawfulness of such sale of the said firearm to the defendants under Chapter 44 of Title 18, United States Code, in that the defendants did execute a Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473, Firearms Transaction Record, to the effect that defendant **SEDALE YOUNG** was the actual buyer of the firearm, when in fact as the defendants then knew, defendant **JERMAINE DRUMMOND** was the actual buyer of the firearm, and did aid and abet in the same.

2. All in violation of Title 18, United States Code, Sections 2, 922(a)(6), and 924(a)(2).

COUNT THREE

The Grand Jury further charges that:

1. On or about September 2, 2019, in the Western District of Virginia, the defendant, **SEDALE YOUNG**, in connection with the acquisition of three firearms, to wit, two SCCY Industries, CPX-2, 9mm pistols, and a Del-ton, model DTI-15, 5.56 x 45 caliber

pistol, from Doomsday Tactical, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to Doomsday Tactical, which statement was intended and likely to deceive Doomsday Tactical, as to a fact material to the lawfulness of such sale of the said firearms to the defendant under Chapter 44 of Title 18, United States Code, in that the defendant did execute a Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473, Firearms Transaction Record, to the effect that defendant **SEDALE YOUNG** was the actual buyer of the firearms, when in fact the defendant knew he was not the actual buyer of the firearm.

2. All in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT FOUR

The Grand Jury further charges that:

1. On or about September 8, 2019, in the Western District of Virginia, the defendants, **SEDALE YOUNG** and **JERMAINE DRUMMOND**, in connection with the acquisition of a firearm, a Del-ton, model DTI-15, 5.56 x 45 pistol, from Doomsday Tactical, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to Doomsday Tactical, which statement was intended and likely to deceive Doomsday Tactical, as to a fact material to the lawfulness of such sale of the said firearm to the defendants under Chapter 44 of Title 18, United States Code, in that the defendants did execute a Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473, Firearms Transaction Record, to the effect that defendant **SEDALE YOUNG** was the actual buyer of the firearm, when in

fact as the defendants then knew, defendant **JERMAINE DRUMMOND** was the actual buyer of the firearm, and did aid and abet in the same.

2. All in violation of Title 18, United States Code, Sections 2, 922(a)(6), and 924(a)(2).

COUNT FIVE

The Grand Jury further charges that:

1. On or about September 13, 2019, in the Western District of Virginia, the defendants, **SEDALE YOUNG** and **JERMAINE DRUMMOND**, in connection with the acquisition of three firearms, specifically three Glock, model 23, .40 caliber pistols, from SWVA Arms, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to SWVA Arms, which statement was intended and likely to deceive SWVA Arms, as to a fact material to the lawfulness of such sale of the said firearms to the defendants under Chapter 44 of Title 18, United States Code, in that the defendants did execute a Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473, Firearms Transaction Record, to the effect that defendant **SEDALE YOUNG** was the actual buyer of the firearms, when in fact as the defendants then knew, defendant **JERMAINE DRUMMOND** was the actual buyer of the firearms, and did aid and abet in the same.

2. All in violation of Title 18, United States Code, Sections 2, 922(a)(6), and 924(a)(2).

COUNT SIX

The Grand Jury further charges that:

1. On or about September 26, 2019, in the Western District of Virginia, the defendants, **SEDALE YOUNG** and **JERMAINE DRUMMOND**, in connection with the acquisition of ten firearms, specifically eight Taurus, model G2C, .40 caliber pistols and two Taurus, model G2C, 9mm pistols, from SWVA Arms, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to SWVA Arms, which statement was intended and likely to deceive SWVA Arms, as to a fact material to the lawfulness of such sale of the said firearms to the defendants under Chapter 44 of Title 18, United States Code, in that the defendants did execute a Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473, Firearms Transaction Record, to the effect that defendant **SEDALE YOUNG** was the actual buyer of the firearms, when in fact as the defendants then knew, defendant **JERMAINE DRUMMOND** was the actual buyer of the firearms, and did aid and abet in the same.

2. All in violation of Title 18, United States Code, Sections 2, 922(a)(6), and 924(a)(2).

COUNT SEVEN

The Grand Jury further charges that:

1. On or about September 27, 2019, in the Western District of Virginia, the defendants, **SEDALE YOUNG** and **JERMAINE DRUMMOND**, in connection with the acquisition of a firearm, a Glock, model 27 Gen 4, .40 caliber pistol from Doomsday

Tactical, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to Doomsday Tactical, which statement was intended and likely to deceive Doomsday Tactical, as to a fact material to the lawfulness of such sale of the said firearm to the defendants under Chapter 44 of Title 18, United States Code, in that the defendants did execute a Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473, Firearms Transaction Record, to the effect that defendant **SEDALE YOUNG** was the actual buyer of the firearm, when in fact as the defendants then knew, defendant **JERMAINE DRUMMOND** was the actual buyer of the firearm, and did aid and abet in the same.

2. All in violation of Title 18, United States Code, Sections 2, 922(a)(6), and 924(a)(2).

COUNT EIGHT

The Grand Jury further charges that:

1. On or about September 27, 2019, in the Western District of Virginia, the defendants, **SEDALE YOUNG** and **JERMAINE DRUMMOND**, in connection with the acquisition of two firearms, a SCCY Industries, model CPX2, 9mm pistol, and a Taurus, model G2C, 9mm pistol, from Doomsday Tactical, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to Doomsday Tactical, which statement was intended and likely to deceive Doomsday Tactical, as to a fact material to the lawfulness of such sale of the said firearms to the defendants under Chapter 44 of Title 18, United States Code, in that the defendants did execute a Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives

Form 4473, Firearms Transaction Record, to the effect that defendant **SEDALE YOUNG** was the actual buyer of the firearm, when in fact as the defendants then knew, defendant **JERMAINE DRUMMOND** was the actual buyer of the firearm, and did aid and abet in the same.

2. All in violation of Title 18, United States Code, Section 922(a)(6) and 924(a)(2).

NOTICE OF FORFEITURE

1. Upon conviction of one or more of the felony offenses alleged in this Indictment, the defendant shall forfeit to the United States:

any firearms and ammunition involved or used in the commission of said offenses, or possessed in violation thereof, pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c).
2. The property to be forfeited to the United States includes but is not limited to the following property:

- a. **Firearm(s) and Ammunition or other assets**

1. Taurus, model G2C, .40 caliber pistol, SN: SMR37310
2. Taurus, model G2C, .9mm caliber pistol, SN: TMR 20478
3. SCCY Industries, model CPX-2, 9mm pistol, SN: 780856
4. SCCY Industries, model CPX-2, 9mm pistol, SN: 792971
5. Del-ton, model DTI-15, 5.56 x 45 caliber pistol, SN: DTI-5188794
6. Del-ton, model DTI-15, 5.56 x 45 caliber pistol, SN: DTI-5188792
7. Glock, model 23, .40 caliber pistol, SN: BLFE271
8. Glock, model 23, .40 caliber pistol, SN: BLFE287
9. Glock, model 23, .40 caliber pistol, SN: BLFE369

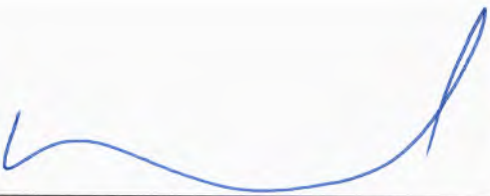
10. Taurus, model G2C, .40 caliber pistol, SN: SMR11565
11. Taurus, model G2C, .40 caliber pistol, SN: SMR11573
12. Taurus, model G2C, .40 caliber pistol, SN: SMR11575
13. Taurus, model G2C, .40 caliber pistol, SN: SMR37670
14. Taurus, model G2C, .40 caliber pistol, SN: SMR11732
15. Taurus, model G2C, .40 caliber pistol, SN: SMR37739
16. Taurus, model G2C, .40 caliber pistol, SN: SMR37676
17. Taurus, model G2C, .40 caliber pistol, SN: SMR11731
18. Taurus, model G2C, 9mm pistol, SN: TMS43355
19. Taurus, model G2C, 9mm pistol, SN: TMS43516
20. Glock, model 27 Gen 4, .40 caliber pistol, SN: BKLD736
21. SCCY Industries, model CPX2, 9mm pistol, SN: 829581
22. Taurus, model G2C, 9mm pistol, SN: TMT50519
23. All ammunition, magazines, and accessories associated with these firearms.

3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States to seek forfeiture of any other property of the defendant up to the value of the above-described forfeitable property, pursuant to 21 U.S.C. § 853(p).

A **TRUE BILL**, this 18 day of November, 2021.


For _____
Christopher R. Kavanaugh
United States Attorney

s/Foreperson
FOREPERSON